IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

WORDCHECK TECH LLC	
v.	NO. 6:10-CV-00457
ALT-N TECHNOLOGIES, LTD., ET AL.	JURY

PLAINTIFF'S ANSWER TO SAFENET'S COUNTERCLAIMS

Plaintiff WordCheck Tech LLC ("WordCheck") answers the counterclaims (Dkt No. 239) of SafeNet, Inc. ("SafeNet"), by corresponding paragraph number, as follows:

PARTIES

1. Admitted.

2. Admitted that WordCheck is a Nevada limited liability company with its principal place of business in Longview, Texas.

JURISDICTION AND VENUE

3. WordCheck admits that SafeNet seeks declaratory relief against WordCheck as enumerated in paragraph 3. Admitted there is a legal case or controversy for purposes of subject matter jurisdiction over SafeNet's counterclaims. Denied as to merits of counterclaims.

4. Admitted there is a legal case or controversy for purposes of venue in this district. Denied as to merits of counterclaims.

5. Admitted. Denied as to merits of counterclaims.

GENERAL ALLEGATIONS

6. Admitted.

7. Admitted.

8. Admitted that SafeNet has asserted counterclaims for declaratory relief. Denied as to merits of counterclaims.

COUNT ONE: DECLARATORY RELIEF REGARDING NON-INFRINGEMENT OF U.S PATENT NO. 6,782,510

9. Denied.

10. Denied.

COUNT TWO: DECLARATORY RELIEF REGARDING INVALIDITY OF U.S PATENT NO. 6,782,510

11. Denied.

12. Denied.

PRAYER FOR RELIEF

A.-L.. To the extent necessary, WordCheck denies that SafeNet is entitled to the relief requested in its prayer for relief. WordCheck denies this is an exceptional case from the perspective of SafeNet being entitled to any such finding. WordCheck admits that this is an exceptional case from the perspective of WordCheck obtaining such a finding against SafeNet. In addition, to the extent necessary, WordCheck generally denies any allegation in the counterclaim not specifically admitted above, and WordCheck re-alleges infringement, enforceability, validity and damages, and denies any allegations in the counterclaim adverse to same.

PRAYER FOR RELIEF

WHEREFORE, WordCheck respectfully requests that this Court enter judgment denying and dismissing SafeNet's counterclaims, and that the Court enter judgment in favor of WordCheck as requested in WordCheck's complaint, as amended or supplemented.

December 8, 2010

Respectfully submitted,

WORDCHECK TECH LLC

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

December 8, 2010

/s/ *Andrew P. Tower*
Andrew P. Tower